



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

August 12, 2025

Via ECF

The Honorable Katharine H. Parker
United States District Court
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Anthem, Inc.*, No. 20 Civ. 2593 (ALC) (KHP)

Dear Judge Parker:

This Office represents the United States of America (the “Government”) in the above-referenced lawsuit. The Government previously filed a motion to compel Anthem, Inc. (“Anthem”) to produce documents that it withheld or redacted on the basis of privilege (the “Motion”). *See* ECF No. 318 (moving brief); ECF No. 347 (reply brief). Anthem opposed that motion. *See* ECF No. 339 (opposition). With Anthem’s consent, we respectfully write to request leave for both parties to each file, by August 15, 2025, a four-page supplemental letter brief addressing information that the Government contends is relevant to the Motion. Specifically, the Government contends that testimony from the August 6, 2025, deposition of Anthem’s former director of government relations, Leah Hirsch, is relevant to the parties’ dispute over two documents that are subject to the Government’s Motion. Anthem disagrees and maintains its position that both documents are privileged. Anthem nevertheless consents to the Government’s request that the parties submit supplemental letter briefing in connection with this issue.

We thank the Court for its consideration of this request and attention to this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: /s/ Adam Gitlin
PIERRE ARMAND
PETER ARONOFF
RACHAEL DOUD
ADAM GITLIN
CHARLES JACOB
DANA WALSH KUMAR
REBECCA TINIO
Assistant United States Attorneys

cc: Anthem’s Counsel (via ECF)